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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

DAVID PIERRE-JONES,

Plaintiff,

v.

JEREMY DEFRANCO,

Defendant.

1:24-cv-00904-KES-CDB

**NOTICE OF SERVICE AND LODGING
OF DEPOSITION TRANSCRIPT**

Judge: The Honorable Christopher D.
Baker
Trial Date: None Set
Action Filed: August 5, 2024

TO PLAINTIFF DAVID PIERRE-JONES, IN PRO SE:

PLEASE TAKE NOTICE THAT on November 10, 2025, Defendant J. DeFranco served Plaintiff, by U.S. Mail, with a copy of the full transcript of the deposition of David Pierre-Jones, taken on August 26, 2025, at Mule Creek State Prison, P.O. Box 409020, and on November 12, 2025, served Plaintiff with the following documents at his updated address, West Valley Detention Center, 9500 Etiwanda Blvd., Rancho Cucamonga, CA 91739:

Transcript of Deposition of David Pierre-Jones, taken on August 26, 2025.

DEFENDANT'S NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT
DEFENDANT'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

DEFENDANT’S RAND WARNING TO PLAINTIFF REGARDING OPPOSING SUMMARY JUDGMENT

DEFENDANT’S STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

DECLARATION OF R. CANNING Ph.D. CCHP IN SUPPORT OF DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

DECLARATION OF ELISE OWENS THORN IN SUPPORT OF DEFENDANT’S MOTION FOR SUMMARY JUDGMENT; EXHIBITS B – D

DECLARATION OF J. DEFRANCO IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

Please take further notice that on November 12, 2025, Defendant lodged a digital copy of the full transcript of the deposition of David Pierre-Jones, taken on August 26, 2025, with the Court by transmitting it to the Court’s designated e-mail, cdborders@caed.uscourts.gov.

Dated: November 13, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California
DAMON G. MCCLAIN
Supervising Deputy Attorney General

/s/ Elise Owens Thorn

ELISE OWENS THORN
Deputy Attorney General
*Attorneys for Defendant
J. DeFranco*

SA2024304596

CERTIFICATE OF SERVICE

Case Name: **David Pierre-Jones (BL8033)
v. DeFranco**

No. **1:24-cv-00904-KES-CDB**

I hereby certify that on November 13, 2025, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

➤ **NOTICE OF SERVICE AND LODGING OF DEPOSITION TRANSCRIPT**

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on November 13, 2025, at Sacramento, California.

K. Vitalie

Declarant for eFiling

/s/ **K. Vitalie**

Signature

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

I further certify that some of the participants in the case are not registered CM/ECF users. On November 13, 2025, the foregoing document(s) have been mailed in the Office of the Attorney General's internal mail system, by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within three (3) calendar days to the following non-CM/ECF participants:

David Pierre, BL8033
West Valley Detention Center
9500 Etiwanda Blvd.
Rancho Cucamonga, CA 91739
In Pro Per

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on November 13, 2025, at Sacramento, California.

I. Martinez

Declarant for Service by U.S. Mail

/s/ I. Martinez

Signature

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